

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**ENRIQUE ROBERTO “HENRY”  
CUELLAR and IMELDA RIOS  
CUELLAR**

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**Case No. 4:24-cr-00224**

**DEFENDANT ENRIQUE ROBERTO “HENRY” CUELLAR’S  
MOTION FOR PRETRIAL PRODUCTION OF  
DISCOVERABLE JENCKS ACT MATERIAL**

TO THE HONORABLE LEE H. ROSENTHAL,  
UNITED STATES DISTRICT JUDGE:

NOW COMES ENRIQUE ROBERTO “HENRY” CUELLAR, Defendant herein, through counsel. Mr. Cuellar requests that the government disclose all witness statements discoverable under 18 U.S.C. § 3500, commonly referred to as "The Jencks Act", as follows:

1. Mr. Cuellar moves for the pretrial disclosure of any Jencks Act material.

2. “Jencks Act” material is meant to include, but not be limited to, the following:

(a) Complete transcripts of Grand Jury testimony given by any government witness;

(b) any memoranda of what any particular government witness may have said, whether included in a formal investigative report and/or in the rough notes of some agent, representative or employee of the government;

3. Alternatively, should any Jencks Act material not be disclosed pretrial, then Mr. Cuellar requests that each government agent and witness be ordered to bring with them all discoverable witness statements, including those described above, for use during cross-examination.

Respectfully submitted,

FLOOD & FLOOD

/s/ Chris Flood

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***ATTORNEYS FOR ENRIQUE ROBERTO  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Chris Flood  
Chris Flood